

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JASON DANIEL FREIBERG,

Defendant.

INDICTMENT

_____ /

The Grand Jury charges:

COUNT 1
(Sexual Exploitation of a Child)

Between on or about July 9, 2023, and on or about July 13, 2023, in Kalamazoo County,
in the Southern Division of the Western District of Michigan, and elsewhere,

JASON DANIEL FREIBERG

knowingly persuaded, induced, and enticed a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions were produced using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce and transmitted using any means or facility of interstate or foreign commerce.

Specifically, the defendant, a resident of Defiance, Ohio, contacted Minor Victim 1, an eleven-year-old girl, via text messages in Kalamazoo, Michigan and persuaded, induced and enticed her to produce a picture or video of herself masturbating or lasciviously exhibiting her genitals. Minor Victim 1 produced and sent an image of her genitals and sent it to the defendant via a Vortex cell telephone manufactured in China.

18 U.S.C. § 2251(a) and (e)

COUNT 2
(Penalties for Registered Sex Offenders)

Between on or about July 9, 2023, and on or about July 13, 2023, in Kalamazoo County,
in the Southern Division of the Western District of Michigan, and elsewhere,

JASON DANIEL FREIBERG,

an individual required by Federal law to register as a sex offender, committed a felony
offense involving a minor under Title 18, United States Code, Section 2251.

18 U.S.C. § 2260A

PRIOR FELONY CONVICTION

The Grand Jury finds that at the time of the illegal acts alleged in Count 1 of this Indictment, JASON DANIEL FREIBERG had a prior conviction under Chapter 117 of the United States Code.

Specifically, on or about October 17, 2000, in the United States District Court for the Middle District of Florida (Case No. 8:00-CR-102-T-27A), JASON DANIEL FREIBERG was convicted of child enticement, in violation of Title 18, United States Code, Section 2422(b).

18 U.S.C. § 2260A

**FORFEITURE ALLEGATION
(Sexual Exploitation of a Child)**

The allegations contained in Count 1 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18 U.S.C. § 2251

JASON DANIEL FREIBERG

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. § 2251 any matter which contains any such visual depiction that was produced, transported, mailed, shipped, and received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offense or any property traceable to such property, including, but not limited to:

1. Lenovo laptop, silver, FCC ID PPD-QCNFA435
2. Apple iPhone 12, black in color, bearing serial number FFXJ54WE0DXW
3. Apple iPhone 14, yellow in color, bearing serial number G6TD2J6HN70L

18 U.S.C. § 2253

18 U.S.C. § 2251

18 U.S.C. § 2256

A TRUE BILL

[/s/ Redacted]

GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE
Acting United States Attorney


TIMOTHY VERHEY
Assistant United States Attorney